### UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: : CHAPTER 13

MARY MCMULLEN ROSS : CASE NUMBER A15-63991-JRS

DEBTOR :

# CHAPTER 13 TRUSTEE'S SUPPLEMENTAL OBJECTION TO CONFIRMATION AND MOTION TO DISMISS CASE

COMES NOW, Nancy J. Whaley, the Standing Chapter 13 Trustee herein, and objects to Confirmation of the plan for the following reasons:

1.

The Trustee requests that Debtor file an amended 2014 tax return for the correct filing status with the Internal Revenue Service and provide a copy to the Trustee in order to determine the accuracy and veracity of the plan and/or Schedules. 11 U.S.C. 521(1), 1325(a)(3), 1325(b)(1)(B).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny Confirmation of the Debtor's plan, and to dismiss the case.

Respectfully submitted,

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Julie M. Anania, Attorney for Chapter 13 Trustee

GA Bar No. 477064

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/mam

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CERTIFICATE OF SERVICE

Case No: A15-63991-JRS

This is to certify that I have this day served the following with a copy of the foregoing Chapter 13 Trustee's Supplemental Objection to Confirmation and Motion to Dismiss Case by depositing in the United States mail a copy of same in a properly addressed envelope with adequate postage thereon.

#### **Debtor(s):**

MARY MCMULLEN ROSS 276 KRISTEN COURT CONYERS, GA 30012

### **Attorney for the Debtor(s):**

THE SEMRAD LAW FIRM, LLC SUITE 3600 101 MARIETTA STREET, NW ATLANTA,, GA 30303

This the 24th day of September, 2015.

/S/

Julie M. Anania
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